

REMARKS

Applicant's representative wishes to thank the Examiner for the telephonic interview conducted on February 20, 2007. To recap the interview, we discussed the claims examined in the Office Action of November 29, 2006, the Nakabayashi reference, and the Examiner's rejections. This Reply incorporates amendments that were proposed during the interview and summarizes points of discussion regarding the Office Action and the Nakabayashi reference.

In the Office Action of November 29, 2006, all of the pending claims were rejected. Independent claims 1, 7, and 12 were rejected under 35 U.S.C. §112, as failing to comply with the enablement requirement. All of the pending claims were rejected under 35 U.S.C. 103(a) as being obvious over Nakabayashi (US 5,675,672) in view of Blalock et al. (US 5,729,008) or a combination of Nakabayashi in view of Blalock et al. further in view of either Fisher et al. (US 2001/0030693), Nakao (US 6,459,819), or Omura et al. (US 2001/0055121).

In this Reply, claims 1, 7, 11-13, and 15-17 are amended. No new matter has been added by the amendments. The amendments are believed to overcome the rejections.

35 U.S.C. §112 Enablement Rejection

Claims 1, 7, and 12 have been amended to more clearly recite that the direction information is used when combining electronic text files. As discussed in the telephone interview with the Examiner, the use of direction information to combine ("stitch") electronic text filed is discussed in ¶0032 of the present application:

In one form of the invention, to facilitate the stitching of text files together, a user may input direction information into camera 300 or device 600, which indicates to OCR and text stitch software 302 the direction that images are being captured (e.g., left to right, right to left, top to bottom, bottom to top). In an alternative embodiment, camera 300 and device 600

include a motion sensor for detecting the direction that the device is moving when capturing images, which is used by OCR and text stitching software 302 to facilitate stitching the text files together.

In regard to the use of direction information to combine electronic text files, amended claim 1 recites:

combining the two selected electronic text files into a combined text file based on the direction information and by a character sequence appearing in common in the two selected electronic text files.

Amended claim 7 recites:

. . . and stitch at least two of the electronic text files together based on the image sequence information, the direction information, and by identifying overlapping text appearing in the at least two electronic text files.

And amended claim 12 recites:

. . . and to stitch the electronic text files together based at least in part on the image sequence information, direction information indicative of a direction of relative movement of the image capturing apparatus, and by character sequence information.

Thus, the amended claims recite the use of direction information to stitch/combine the electronic text files, as disclosed in ¶0032.

We respectfully request that the 35 U.S.C. §112 enablement rejections be withdrawn.

35 U.S.C. §103(a) Obviousness Rejections

All of the claims were rejected under 35 U.S.C. §103(a) as obvious over Nakabayashi in view of at least one other reference. In the Office Action, Nakabayashi is relied upon as disclosing most of the elements of independent claims 1, 7, and 12.

The Office Action states that while Nakabayashi does not explicitly disclose the claim elements of combining/stitching text together based on direction information,

Blalock et al. does. The Office Action states that Nakabayashi and Blalock et al. are combinable because they are from the field of document scanning and that it would have been obvious to modify Nakabayashi in view of Blalock et al., "the motivation being to aid in arranging the captured overlapping image portions."

We traverse the rejection for at least the reason that Nakabayashi teaches away from modification toward using direction information.

As discussed during the Examiner interview, Nakabayashi teaches away from using direction information to combine text files. Nakabayashi teaches using edge information to "eliminate the need for each scan having to be referenced back to a common absolute coordinate system or being coordinate dependent with one another . . ." Nakabayashi, col. 2, lines 20-25. "A further advantage of the present invention is that the first two-dimensional coded character string file is coordinate independent of the second two-dimensional coded character string file." Nakabayashi, col. 2, line 66 to col. 3, line 2. Nakabayashi states further:

Stated another way, the first scan 28 and the second scan 30 do not have to be referenced back to a common absolute coordinate system (see block 48). That way, edge information (top, bottom, left and right) of each scan 28 and 30 is retained for use in rejoining the files in the first memory 14 and the second memory 16, independent of the coordinates of the coded characters. col. 4, lines 51-58.

Thus, Nakabayashi teaches away from using coordinate information, which in essence is direction information, to combine files. Rather, Nakabayashi teaches to rely solely on edge information.

In accord with the Examiner's recommendation given during the interview, the use of identifying character sequences between two text files is included in each of the independent claims. For example, claim 1 provides:

combining the two selected electronic text files into a combined text file based on . . . a character sequence appearing in common in the two selected electronic text files.

For at least the reasons stated above, claim 1 and its dependent claims are patentable over the cited references and the rejections should be withdrawn.

Independent claims 7 and 12 in the present application are similar to claim 1. Accordingly, claims 7 and 12 and their respective dependent claims are patentable over the cited references for at least the same reasons as claim 1.

Conclusion

Therefore, in view of the above amendments and remarks, we respectfully request that the Examiner withdraw the enablement rejections and the rejections based on Nakabayashi, Blalock et al., Fisher et al., Nakao, and Omura et al., and we submit that this application is in condition for allowance and such action is earnestly requested.

If for any reason the Examiner is not able to allow the application, he is requested to contact the Applicant's undersigned attorney at (312) 321-4200.

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